

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Case No: 1:16-cv-00563 (PTG/WBP)

**PLAINTIFFS' REPLY IN SUPPORT OF THEIR MOTION FOR PARTIAL
RECONSIDERATION OF THE COURT'S ORDER CONTINUING THE TRIAL DATE**

Defendants' Response to Plaintiffs' Motion for Partial Reconsideration of the Court's Order Continuing the Trial Date (ECF 506) does not oppose any of the relief sought in Plaintiffs' Motion (ECF 502). Defendants do not argue against lifting the stay imposed by the Court (which Defendants never sought in their original motion for a continuance); they "do[] not oppose the setting of a trial date"; and they acknowledge that a final pre-trial hearing (which was originally scheduled for July 17 and which was canceled on July 2 by the Court's stay order) should be scheduled "sufficiently in advance of a trial date to allow the parties to properly prepare for trial." ECF 506 at 1-2.

The remainder of Defendants' Response (at 2-8) does not respond to Plaintiffs' Motion and instead provides Defendants' unsolicited argument about the pending pre-trial motions and matters. The evidentiary motions were all fully briefed and ripe for resolution at the scheduled July

17 hearing. No further argument on the evidentiary motions was or is appropriate. As to other standard pre-trial matters such as pre-trial disclosures, stipulations, witness and exhibit lists, deposition designations, and objections thereto, Plaintiffs will continue to meet and confer with Defendants to attempt to reach agreement wherever possible.

For the foregoing reasons and the reasons in Plaintiffs' memorandum in support (ECF 503), Plaintiffs' Motion for Partial Reconsideration of the Court's Order Continuing the Trial Date should be granted; the stay should be lifted; a new one-week trial date should be set in December 2024; and the final pre-trial motions hearing (originally scheduled for July 17) should be scheduled seasonably in advance of the new trial date. A proposed order was attached to Plaintiffs' Motion (ECF 502-1).

Dated: July 17, 2024

ZUCKERMAN SPAEDER LLP
Nicholas M. DiCarlo (admitted *pro hac vice*)
1800 M Street NW, Suite 1000
Washington, DC 20036
202.778.1800
ndicarlo@zuckerman.com

Cyril V. Smith (admitted *pro hac vice*)
100 East Pratt Street, Suite 2440
Baltimore, MD 21202-1031
410.332.0444
csmith@zuckerman.com

Respectfully Submitted,

/s/ Granville C. Warner
LEGAL AID JUSTICE CENTER
Granville C. Warner, VSB #24957
Nady Peralta, VSB #91630
Larisa D. Zehr, VSB #96032
6402 Arlington Blvd., Suite 1130
Falls Church, VA 22042
703.778.3450
cwarner@justice4all.org
nady@justice4all.org
larisa@justice4all.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of July, 2024, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/ Granville C. Warner

Granville C. Warner, VSB #24957